

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

RUSSELL H. DAWSON,

Plaintiff,

vs.

NAPHCARE, INC., et al;

Defendants.

NO. 2:19-cv-01987-RSM

**DECLARATION OF JAMES T.
ANDERSON IN SUPPORT OF
STIPULATED MOTION TO SEAL
DKT. 248**

**NOTED FOR HEARING FEBRUARY
28, 2022**

I, James T. Anderson, make this Declaration based on my personal knowledge, and I am competent to testify to the contents set forth herein:

1. I am an attorney with Krutch Lindell Bingham Jones, P.S., attorneys for Plaintiff in the above-captioned matter.
2. This declaration is made in support of the parties' joint motion to seal the Declaration of J. Nathan Bingham In Support of Joint Petition for Approval of NaphCare Settlement (Dkt. 248), in compliance with LCR 5(g)(3)(A).
3. On February 28, 2022, I spoke on the phone and exchanged emails with Defendants' counsel Heidi Mandt regarding the necessity of the Declaration of J. Nathan Bingham In Support of Joint Petition for Approval of NaphCare Settlement (Dkt. 248) being sealed. We agreed to file a stipulated motion to seal this declaration.

DECLARATION OF JAMES T. ANDERSON IN SUPPORT
OF STIPULATED MOTION TO SEAL DKT. 248 - 1
2:19-cv-01987-RSM

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1 4. On the morning on February 28, 2022, our office called the court's online case
2 management and electronic case filing desk requesting the immediate sealing of Dkt. 248,
3 with the understanding that the appropriate paperwork for authorization would follow.
4

5 SIGNED this 28th day of February, 2022
6

7 KRUTCH LINDELL BINGHAM JONES, P.S.

8 By: /s/ James T. Anderson

9 James T. Anderson, WSBA #40494

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